

# **EXHIBIT B**

**Abigail E. Krueger**

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**From:** Heather Kliebenstein  
**Sent:** Wednesday, March 6, 2019 10:46 PM  
**To:** Pham, Christopher; Janus, Leah; Fleming, Terrence  
**Cc:** Allen Hinderaker; '15081.0008USZA.active@ef.merchantgould.com'; Joe Dubis, Ph.D.; Michael Erbele  
**Subject:** Discovery Deficiencies

Counsel, in follow up to our conference today, we write regarding additional discovery deficiencies outlined below:

- The most recent supplemental responses to ROGS 16-20 are not verified. Please promptly provide signed verifications for these responses.
- Also, the most recent supplemental responses to ROGS 16-20 do not report gross written premium quarterly, as requested. Please promptly advise whether these responses will be further supplemented to report quarterly.
- The response to RFPs 89-90 is incomplete. Absent from the document you produced, FED017886, is Profitability Indicator, CIS Claims, Adapt as used in APZ, Adapt as used in EUZ, and EZER as used in EUZ. We acknowledge your contention that other applications do not use Blaze Advisor® software. Please complete the document providing the requested information by the end of the week.
- The documents just produced in response to RFP 30-32 do not (with perhaps one exception) include 2019 data. We will request updated information prior to trial.
- You have not replied to our letter regarding the clawed back documents. We would like to schedule our meet and confer on that subject this week. I am available tomorrow between 1:30-4.

Best,

Heather

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